

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

LADARION HUGHES, ANGELA §
ALONZO, and DEMARCUS LIVELY, §
§
Plaintiffs, §
§
v. §
§
SMITH COUNTY, TEXAS, §
§
Defendant. §

Civil Action No. 6:23-cv-344

THE PARTIES' JOINT MOTION TO EXTEND DISCOVERY DEADLINES

TO THE HONORABLE JUDGE OF SAID COURT:

COME NOW the Parties in the above-styled and -numbered cause and file this their Joint Motion to Extend the existing deadlines, and would respectfully show unto the Court as follows:

On October 30, 2023, the Court entered its Order [#12] governing discovery. The Order requires that all fact discovery be completed by June 24, 2024. (Order [#12], p. 2.)

Although the Parties have completed significant discovery heretofore, they now respectfully request that the Court extend the written discovery and document production deadline. They propose a final written fact discovery deadline of September 20, 2024, and a final oral discovery deadline of November 20, 2024. Specifically, the Parties have exchanged significant discovery in the present case. At this point, over 10,000 pages of documents have been produced. The voluminous discovery has led the Parties to the conclusion that an extension is necessary for the Parties to adequately prosecute and defend against the claims in this case. This extension is not requested solely for delay, but so that justice may be done.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request that the Court extend the final written discovery and document production deadline to September 20, 2024, and the final oral

discovery deadline to November 20, 2024, and for any and all relief, at law or in equity, to which he has shown himself to be justly entitled.

Respectfully submitted,



David Iglesias
Lead Counsel
State Bar No. 24051733
david@iglesiaslawfirm.com

IGLESIAS LAW FIRM, PLLC
605 Chase Drive, Suite 8
Tyler, Texas 75701
Telephone: (903) 944-7185
Facsimile: (903) 630-5338

Dallas Office:
1412 Main Street, Suite 608
Dallas, Texas 75202

COUNSEL FOR DEFENDANT
SMITH COUNTY, TEXAS

/s/Meg Gould
Steve Weil
Meg Gould
LOEY & LOEY
311 N. Aberdeen
Chicago, Illinois 60607
Telephone: (312) 243-5900
gould@loevy.com

Nathan Fennell
nfennell@fairdefense.org
Camilla Hsu
chsu@fairdefense.org

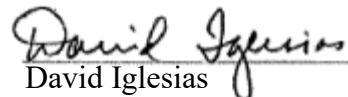
Texas Fair Defense Project
314 E. Highland Mall Blvd #204
Austin, TX 78752
Telephone: (512) 637-5220

Akeeb Dami Animashaun
animashaun@pm.me
355 S. Grand Ave, Suite 2450
Los Angeles, CA 90071
Telephone: (929) 266-3971

**COUNSEL FOR PLAINTIFFS,
LANDARION HUGHES, ANGELA
ALONZO, AND DEMARCUS
LIVELY**

CERTIFICATE OF SERVICE

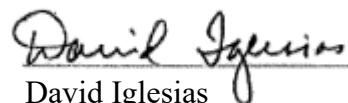
I hereby certify that on June 20, 2024, a copy of the foregoing was transmitted to all counsel of record in the above-referenced and -numbered action via electronic filing system.



David Iglesias

CERTIFICATE OF CONFERENCE

I hereby certify that on June 18, 2024, the undersigned attorney contacted Plaintiffs' Counsel regarding their position on this Motion. After discussing its merits, the Parties have agreed to file this Motion jointly.



David Iglesias